

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

**MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANT JOSEPH CARAMDRE'S
MOTION FOR 14-DAY PERIOD IN WHICH TO FILE REPLY MEMORANDUM**

Defendant, Joseph Caramadre, has filed a motion requesting a 14-day period in which to submit a response to the “Government’s Opposition to Defendant Caramadre’s Motion to Withdraw his Guilty Plea”.

For reason, undersigned counsel informs the Court that yesterday (March 13, 2013) counsel received from Mr. Caramadre's prior counsel a compact disc containing 373 pages of correspondence containing information critical to the consideration of Mr. Caramadre's motion to withdraw his guilty plea. These documents were not transmitted with the original transfer of Mr. Caramadre's file, and counsel requires this period of time in which to review these documents for incorporation into his reply to the Government's oppositional memorandum.

In addition, Attorney Watt, who has entered his appearance as co-counsel for Mr. Caramadre, is currently out of the country and will not be able to review Mr. Caramadre's reply memorandum before the March 28 date.

WHEREFORE, Mr. Caramadre respectfully requests a 14-day period of time, through March 28, 2013, in which to submit his reply memorandum.

Respectfully submitted,
Joseph Caramadre,
By his attorneys,

/s/ Randy Olen

Randy Olen, Esq.
478A Broadway
Providence, RI 02909
(401) 274-1400
(401) 274-2480 (fax)

/s/ Robert D. Watt, Jr.

Robert D. Watt, Jr., Esq.
84 Ship Street
Providence, RI 02903
(401) 273-0484
(401) 453-4906 (fax)

CERTIFICATION

I hereby certify that on this 14th day of March 4, 2013, I caused to be delivered, via first class mail, the within ***Memorandum of Law*** to:

John P. McAdams, Esq.
U.S. Attorney's Office
50 Kennedy Plaza, 8th Floor
Providence, RI 02903

Lee Vilker, Esq.
U.S. Attorney's Office
50 Kennedy Plaza, 8th Floor
Providence, RI 02903

Olin W. Thompson, Esq.
Federal Defender's Officer
10 Weybosset Street, Suite 300
Providence, RI 02903
